

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of MB Docket No. 12-203, Annual Assessment of the Status of
Competition in the Market for the Delivery of Video Programming

COMMENTS OF:

**Boston Community Access and Programming Foundation (Boston Neighborhood
Network)**

Boston Neighborhood Network (BNN) submits these comments in response to the
above-captioned

Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and
comment on the state of competition in the delivery of video programming.”

Community media fills a need for local content that is not being met by other media
outlets. Although the number of channels is growing, the number of media companies is
declining through consolidation and merger, investing each with a disproportionate
capacity to shape public opinion. Through the training, production facilities, channels and
websites provided by community media centers like BNN, an empowered citizenry
shares independent perspectives, strengthening our understanding of each other, our
communities, and the world we live in.

In Boston, we are fortunate to have strong support from city and state government for
community access to media. Cable providers are committed to giving something back to
the people that provide their profits. National regulations have supported a process that
yields essential local content that would otherwise be unavailable. Prior to 1983, before
Boston was wired for cable, TV was a one-way medium, with no opportunity to
participate. Like today, commercial TV was created for mass appeal and maximum profit
as dictated by Nielsen ratings above all other considerations. Then, in the city’s first
franchise agreement, Cablevision agreed to provide an annual franchise fee in support of
the newly founded Boston Community Access and Programming Foundation, known
today as Boston Neighborhood Network (BNN). This process has continued through a
succession of cable companies, mayors and agreements, providing benefits that have
become part and parcel of the civic, social and cultural fabric of the city.

Since 1983, Boston residents and organizations (over 12,000 memberships and 1,400
participating organizations), representing every community and aspect of city life, have
participated in a variety of program offerings.

Education: Participants of all ages learn to use television production equipment to
develop the skills they need to create their own non-commercial programming. Other
classes help members develop 21st century technology and job-readiness skills.

Civic Engagement: Constituents have access to field production equipment, studios, a
multimedia computer lab, edit rooms and a mobile production truck to produce their

programs. Twenty-four hours a day, two BNN cable channels reach over two-thirds of Boston households and are available globally through web-streaming.

Youth Program: Through various program offerings, young people create programs that positively impact their lives, address issues of concern, counter negative stereotypes, and promote constructive youth activities and opportunities citywide.

BNN-Produced Programming: BNN also produces programming of local interest that would otherwise be unavailable, such as a nightly news program providing in-depth interviews and on-location coverage of issues and happenings of vital importance to all of Boston's communities. Other BNN community service programs include political debates, neighborhood parades and cultural festivals.

BNN operates two public access channels, as provided by the city's cable providers Comcast and RCN. This is the same number of channels as provided in June, 2010; and have been retained in the same prominent channel positions. Our two channels are on the basic tier, available to all cable subscribers; those with analog sets need a digital converter box to receive programming. Program schedules are available at our website and in between programs on our channels, but unfortunately are not detailed in the cable providers' TV listings. We carefully track our programming output - over 3,000 shows (including 925 programs live from our studios) produced in Boston last year, in many languages, reflecting the increasing diversity of our city.

In 2007, we consolidated two inadequate facilities in the new BNN Charles J. Beard II Media Center, a renovated former MBTA power station in Egleston Square, Roxbury. The BNN Beard Center has been awarded LEED Silver certification by the U.S. Green Building Council, been recognized with awards for excellence in historic preservation from both the Massachusetts Historical Commission and Boston Preservation Alliance, and been listed on the National Register of Historic Places. This has been part of our transition to digital technology, as we upgraded our media lab, studios and mobile truck to enable improvements in production quality. Advancements in technology have given community media centers the ability to provide high definition, high quality digital signals comparable to that of local broadcasters. Unfortunately, our cable provider does not accept these high definition digital signals or content from us. We must down-convert our content and signal to a standard definition analog signal. We hope our continuing conversations will enable us to share improved signal quality with viewers.

We ask the FCC to preserve PEG channels as stipulated in local franchise agreements and to resist attempts by cable providers to make these channels hard to find (via high channel numbers and multi-level menus), hard to view (poor quality) and too expensive, if placed on costly digital tiers. Let us not devalue the efforts of our community media-makers by banishing their voices to less prominent channel positions, or by providing sub-standard resources. And let us look at the astonishing productivity in local programming production that results from regulations supporting community media centers, preserve this capacity where it still exists, and consider models that will further extend these educational and communications opportunities to all communities

nationwide.

A handwritten signature in black ink, reading "Curtis Henderson Jr." in a cursive script.

Curtis Henderson, Jr.
General Manager
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